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10 Attorneys for Defendants
 11 HSBC MORTGAGE CORPORATION (USA) AND
 12 HSBC BANK USA, N.A.

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 15
 16 UNITED STATES DISTRICT COURT
 17
 18 NORTHERN DISTRICT OF CALIFORNIA
 19
 20 SAN FRANCISCO DIVISION

21 Philip Wong, Frederic Chaussy, and Leslie
 22 Marie Shearn, individually, on behalf of all
 23 others similarly situated, and on behalf of
 24 the general public,

25 Plaintiffs,

26 v.

27 HSBC Mortgage Corporation (USA);
 28 HSBC Bank USA, N.A.; and DOES 1
 through 50, inclusive,

Defendants.

Case No. C 07 2446 MMC [ECF]

**DECLARATION OF HENRY YIP IN
 SUPPORT OF DEFENDANTS' MOTION
 FOR RULE 11(C) SANCTIONS**

Date:	October 10, 2008
Time:	9:00 a.m.
Courtroom:	7 (19th Floor)
Judge:	Hon. Maxine M. Chesney

1 I, Henry E. Yip, hereby declare and state:

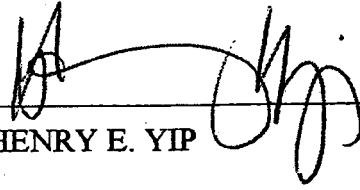
2 1. I have personal knowledge of the facts set forth below. If called as a witness,
3 I could and would testify to the following:

4 2. I am employed by HSBC Technology & Services (USA) Inc. (hereinafter
5 "HTSU"). My job title is Director-Network Systems DSS E-Mail Operations. In my job, I oversee
6 the email systems for various affiliates of HSBC North America Holdings, Inc. including HSBC
7 Bank USA, NA (hereinafter "HBUS") and HSBC Mortgage Corporation (USA) (hereinafter
8 "HCMU").

9 3. Attached hereto as Exhibit A is a true and correct copy of the "HSBC North
10 America Holdings, Inc. E-mail Policy," available on the corporate intranet.

11 I declare under penalty of perjury under the laws of the States of California and New
12 York and the United States of America that the foregoing declaration is true and correct to the best
13 of my personal knowledge.

14 Executed this 25th day of April 2008, in New York, New York.

15 
16 HENRY E. YIP

17 Firmwide:85027166.1 023404.1043

EXHIBIT A

**THIS EXHIBIT IS FILED WITH DEFENDANTS' MOTION FOR
ADMINISTRATIVE RELIEF TO FILE UNDER SEAL EXHIBITS IN SUPPORT
OF DEFENDANTS' MOTION FOR RULE 11(C) SANCTIONS**